U.S. DISTRICT COURT DISTRICT OF MARYLAND

2016 JUN -8 PM 2: 36

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

RENEE L. MCCRAY	}	BY Kho
Plaintiff,	}	
vs.	}	Civil Action No.: 16-cv-00934-PJM
SAMUEL I. WHITE, P.C., et al.	}	
Defendants	}	
	}	

PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S SAMUEL I WHITE, P.C., ET AL. MOTION TO DISMISS OR IN THE ALTERNATIVE FOR SUMMARY JUDGMENT OF THE COMPLAINT

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW the Plaintiff, Renee L. McCray, files this Motion for Extension of Time to respond to Defendant's Motion to Dismiss for reasons stated as follows:

- 1. On Monday, June 6, 2016, Plaintiff contacted, Robert H. Hillman, the attorney in the above referenced case via telephone and email to request an extension of time pursuant to the local Rule 105. Plaintiff assured Mr. Hillman that the request was not for the purposes of delay but for medical reasons and that Plaintiff has a documented disability and needs an additional 14 days to respond. For several days, Mr. Hillman attempted to harass Plaintiff by stating he needed to know what Plaintiff's disability consisted of in order for him to not oppose the request. Plaintiff stated she did not have to disclose her medical history with him and stated she would provide the Court with such documentation if required.
- 2. Due to Plaintiff's medical disability, Plaintiff cannot use the computer for long periods of time.
- 3. Due to Plaintiff being pro se without staff or legal assistance to assist her, Plaintiff is requesting an additional 14 day extension of time to respond to Defendant's Motions to

Dismiss. Plaintiff believes she will be able to respond to the motion no later than Friday, July 1, 2016.

4. This is Plaintiff's first application for extension of time in this case.

WHEREFORE, the Plaintiff respectfully requests the court allow Plaintiff the additional 14 days to respond as requested.

Respectfully Submitted,

Renee L. McCray, Plaintiff

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Baltimore, MD 21229 (410) 945-2424

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing document above has been sent to the following listed below by USPS First Class Mail (see attached mailing receipt).

Robert H. Hillman 611 Rockville Pike Suite 100 Rockville, MD 20852

Dated: June 8, 2016

C. McCary